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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THEIR MOTION TO
COMPEL RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal Exhibits to Their Motion to Compel Responses to Interrogatories and Production of Documents. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 6	Entire Document	Plaintiff
Exhibit 15	Entire Document	Defendants
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

Exhibit 1A is Uber’s First Set of Requests for Production, and the highlighted portions of Exhibit 1A contain technical information designated by Waymo as either confidential or highly confidential. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

Exhibit 3 is Waymo’s Responses to Uber’s First Set of Requests for Production. These Responses were designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo under the Protective Order. (Yang Decl. ¶ 3.)

Exhibit 6 is Waymo’s Responses to Uber’s First set of Interrogatories, which was likewise designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo under the Protective Order. (Yang Decl. ¶ 4.)

Exhibit 15 is a email from Quinn Emanuel to the Uber legal team. This email includes the email addresses of certain high-ranking company executives. Defendants seek to seal this information in order to protect the privacy of these executives, as they are prominent individuals at a company that is currently the subject of extensive media coverage. Disclosure of this

1 information for these high-ranking executives could expose them to harm or harassment. (Yang
2 Decl. ¶ 5.)

3 Exhibit 18 is an internal Google presentation. This presentation has been designated as
4 “Highly Confidential – Attorneys’ Eyes Only” by Waymo. (Yang Decl. ¶ 6.)

5 Exhibit 21 is Waymo’s Third Set of Requests for Production to Uber. The highlighted
6 portions of Exhibit 21 have been designated as “Highly Confidential – Attorneys’ Eyes Only” by
7 Waymo. (Yang Decl. ¶ 7.)

8 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
9 documents at issue, with accompanying chamber copies.

10 Defendants served Waymo with this Administrative Motion to File Documents Under
11 Seal on June 21, 2017.

12 For the foregoing reasons, Defendants request that the Court enter the accompanying
13 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and
14 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –
15 ATTORNEYS’ EYES ONLY.”

16 Dated: June 21, 2017

MORRISON & FOERSTER LLP

18 By: /s/Arturo J. González
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